

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
	:	
Robert W. Anderson	:	No. 19-17009-MDC
Debtor	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION  
IN CONSIDERATION OF THE CARES ACT

Debtor, by attorney David M. Offen, makes the following Motion to Modify Plan After Confirmation and in support hereof states as follows:

1. Debtor filed a Chapter 13 Petition and Plan with this Court on November 7, 2019.
2. The debtor's confirmed Plan provided for a base plan in the amount of \$62,705.00 to be paid in over a 60 month period.
3. The debtor's plan was confirmed on April 16, 2020.
4. The debtor is a senior citizen with a number of medical conditions that frequently put him in a financial bind. The debtor recently needed to upgrade his air conditioning system as his medical conditions prevent him from sustaining extended periods of extreme heat.
5. Reducing the Trustee payments will allow the debtor some relief from his financial strains.
6. Protections under the CARES Act provide for Confirmed Chapter 13 Plans to be extended up to 7 years in the event of a hardship.
7. The debtor has paid a total of \$3,140.00 into the Chapter 13 Trustee over 7 months.
8. The debtors' modified plan will provide for monthly payments in the amount of \$775.00 per month and continuing for 77 months for a total base amount of \$62,815.00.

9. Debtor respectfully requests his Chapter 13 plan to be modified to consider the protections provided under the CARES Act and extend the plan length by 24 months.

WHEREFORE, Debtor, by Attorney, respectfully requests that Your Honorable Court enter an Order to reflect that the Modified Chapter 13 Plan attached hereto as Exhibit "A" is hereby approved with a new base amount of \$62,815.00.

Date: 6/8/20

/s/ David M. Offen  
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